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**FILED**  
Clerk  
District Court

**DEC 26 2024**

for the Northern Mariana Islands  
By JP  
(Deputy Clerk)

6 **IN THE UNITED STATES DISTRICT COURT**  
7 **FOR THE NORTHERN MARIANA ISLANDS**

8 **UNITED STATES OF AMERICA,**

9 Plaintiff,

10 vs.

11 KANGLE JIANG; ZHAOXIANG CUI;  
LIANMIN SONG; FENGGUO FAN;  
and XIAOGUANG WANG,  
12

13 Defendants.

Criminal Case No. **CR - 24 - 00024**

**INDICTMENT**

**Count One:**

**Conspiracy and Aiding and Abetting  
Transportation of Illegal Aliens**  
8 U.S.C. § 1324(a)(1)(A)(ii), and (v)(I) & (II)

**Count Two:**

**Conspiracy to Defraud the United States**  
18 U.S.C. § 371

15 THE GRAND JURY CHARGES THAT:

16 **The Agreement**

17  
18 1. From in or about December 2024, to on or about December 10, 2024, Kangle Jiang;  
19 Zhaoxiang Cui; Lianmin Song; Fengguo Fan; and Xiaoguang Wang (collectively "Defendants")  
20 combined, conspired, confederated, and agreed with each other, and with others known and  
21 unknown to the Grand Jury, and abetted a scheme to transport aliens from Saipan, in the  
22 Commonwealth of the Northern Mariana Islands, to the Territory of Guam, with the intent that  
23 the aliens would reside unlawfully in Guam, knowing and in reckless disregard of the fact that  
the aliens were illegally present in the United States, including in the Commonwealth of the  
Northern Mariana Islands (CNMI).

INDICTMENT- 1

**Purpose and Means of the Scheme**

2. Defendants together and in agreement with at least one other person, sought out and hired other individuals as co-conspirators for the purpose of providing Defendants and other aliens with transportation from Saipan, in the CNMI, to the Territory of Guam.

3. The purpose of the transportation was to directly and substantially enable Defendants to further their unlawful presence in the United States, by relocating from Saipan, where low wages and job scarcity made the Defendants' continued unlawful presence difficult, to Guam, where higher wages, more job opportunities, and a lower risk of detection made Defendants' continued unlawful presence less difficult.

4. To complete the scheme's objective, the conspirators planned and agreed to use deceitful and dishonest means to obstruct the government's legitimate function of detecting and removing aliens unlawfully present in the United States. Such means included:

- a. Travelling by sea instead of by the safer, cheaper, and faster mode of travelling by airplane (but which would have risked detection at government inspection points);
- b. Travelling at night in a small motorboat that would be difficult for government officials to detect;
- c. Arriving in Guam at a remote location, away from government customs and immigration inspection points;
- d. Telling the participants to delete electronic messages regarding the trip from their mobile devices; and
- d. Hiding to avoid encountering law enforcement officials in Guam.

5. Defendants participated in, and aided and abetted the scheme by knowingly contributing money to pay for the voyage.

**Overt Acts**

Defendants and/or the unindicted co-conspirators performed the below acts in furtherance of the scheme:

6. In or about December 2024, Defendant Kangle Jiang paid an unindicted co-conspirator

1 \$6,000 USD for the boat voyage from Saipan to Guam.

2 7. In or about December 2024, Defendant Fengguo Fan paid an unindicted co-conspirator  
3 \$6,100 USD for the boat voyage from Saipan to Guam.

4 8. On or about December 9, 2024, Defendants and several unindicted co-conspirators  
5 boarded the motorboat in Saipan, Commonwealth of the Northern Mariana Islands, and then  
6 drove the boat to the Territory of Guam.

7 **Count One: Conspiracy and Aiding and Abetting Transportation of Illegal Aliens**  
8 8 U.S.C. § 1324(a)(1)(A)(ii), and (v)(I) & (II)

9 9. Paragraphs 1-8 are incorporated by reference.

10 10. From in or about December 2024, to on or about December 10, 2024, in the District of  
11 the Northern Mariana Islands and elsewhere, Defendants Kangle Jiang; Zhaoxiang Cui; Lianmin  
12 Song; Fengguo Fan; and Xiaoguang Wang combined, conspired, confederated, and agreed with  
13 each other, and with others known and unknown to the Grand Jury, and aided and abetted others,  
14 known and unknown to the Grand Jury, to violate 8 U.S.C. § 1324(a)(1)(A)(v)(I) and (II),  
15 specifically, conspiracy, and aiding and abetting the transportation of illegal aliens in violation of  
16 8 U.S.C. § 1324(a)(1)(A)(ii), to wit, by agreeing to, and aiding and abetting the transportation of  
17 aliens, knowing and in reckless disregard that said aliens were in the United States in violation of  
18 law and were not authorized to enter the Territory of Guam, in furtherance of such violation of  
19 law, in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), and (v)(I) and (II).

20 **Count Two: Conspiracy to Defraud the United States**  
21 18 U.S.C. § 371

22 11. Paragraphs 1-8 are incorporated by reference.

23 12. From in or about December 2024, to on or about December 9, 2024, in the District of the  
Northern Mariana Islands and elsewhere, Defendants Kangle Jiang; Zhaoxiang Cui; Lianmin  
Song; Fengguo Fan; and Xiaoguang Wang combined, conspired, confederated, and agreed with

1 each other, and with others known and unknown to the Grand Jury, to defraud the United States,  
2 in violation of Title 18, United States Code, Section 371.

3  
4 Dated this 26th day of December 2024.

5  
6 A TRUE BILL.

7  
8 Signature of foreperson has been  
**REDACTED** pursuant to the Privacy Policy of the  
9 Judicial Conference of the United States.

10  
11 SHAWN N. ANDERSON  
United States Attorney

12  
13 By:

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16 ERIC S. O'MALLEY  
17 Assistant United States Attorney  
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